



DEPARTMENT OF THE NAVY

THE ASSISTANT SECRETARY OF THE NAVY
(ENERGY, INSTALLATIONS & ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON DC 20350 - 1000

Ms. Mary Nichols
Chair, Air Resources Board
California Air Resources Board (ARB)
1001 "T" Street
Sacramento, CA 95825

SEP 16 2011

Dear Ms Nichols:

On behalf of the Department of the Navy (DoN) installations in California, I wish to thank you and your staff for continuing to recognize and support our military mission. The Navy and Marine Corps Southwest installations and range complexes form the backbone for our training capability that supports operational missions throughout the world. We are grateful that ARB has worked cooperatively on a host of air quality initiatives where we have identified mission related and/or unique Federal issues. Consistent with this history of cooperation, I am writing today to seek your assistance on an issue that I know you are familiar with.

Specific to the California cap and trade program, we are extremely concerned with the regulations implementing AB 32 (California's Global Warming Solutions Act of 2006), as fiscal and constitutional law presents barriers to Federal participation. Since December 2010, on behalf of DoD, the DoD Regional Environmental Coordinator for Region 9 has provided numerous comments on the record expressing this concern and requesting recognition of these barriers in the form of regulatory relief. I strongly support the DoD Regional Environmental Coordinator's current proposed language seeking permanent regulatory relief, and would request that you and the ARB give it careful consideration.

Green house gas (GHG) emission reduction is a common goal. The Military Services are making great progress toward reducing our overall carbon footprint as established in a variety of Federal mandates, both regulatory and executive. Based on President Obama's October 5, 2009 Executive Order 13514 entitled "Federal Leadership in Environmental, Energy, and Economic Performance", the DoD has established a 34% Greenhouse Gas (GHG) Scope 1 and 2 reduction target by 2020, based on a 2008 baseline. DoD's GHG reduction commitment is clear and substantial.

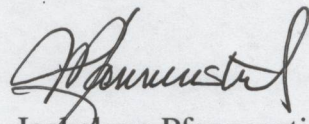
These GHG emission reductions are being achieved through a variety of energy initiatives including increased energy efficiency measures, alternative energy development, and an aggressive pursuit of large-scale renewable energy projects. We have been at the forefront of alternative and renewable energy development in California since as far back as 1987 with the 270 MW geothermal power plant in NAWC China Lake. More recently, the Department of the Navy has installed more than a megawatt of solar photovoltaic (PV) at Naval Base Coronado, 1.5 MW of wind power at MCLB Barstow, and 675 KW of wind power on San Clemente Island. Just within the past year, DoN completed development of a 1.4 MW solar PV array at Camp Pendleton and has made award for another 1.4 MW second phase. Also in 2011, DoN awarded contracts for a 1.1 MW solar PV array at MCLB Barstow, a 1.3 MW solar PV array at SPAWAR San Diego, 1.8 MW of solar PV at MCRD San Diego and a 3.2 MW landfill gas fired power plant at MCAS Miramar. The Navy and Marine Corps are also leading the way in sustainable buildings and net-zero energy, requiring LEED Gold criteria for future new construction projects and undertaking a net-zero energy pilot at MCAS Miramar.

The point, of course, is that even absent the military's participation in the California specific cap and trade program, California will still achieve significant GHG reductions from DoD sources.

In closing, I add my voice to that of the DoD Regional Environmental Coordinator's, and ask that you support the proposed language that would grant permanent exemptions to the DoD facilities in California.

If there is any additional information I can offer on this matter, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jackalyne Pfannenstiel", written in a cursive style.

Jackalyne Pfannenstiel

Copy to:
Mr. James Goldstene